

AFFIDAVIT

I, Jonathan E. Spaeth, being first duly sworn state:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since December of 2008. I am currently assigned to the Violent Crimes Squad within the Kansas City Division of the FBI, responsible for conducting bank robbery and Hobbs Act investigations. The information contained in this affidavit is based upon my knowledge, and upon information provided to others and me by persons and agencies that I believe to be reliable. Except where otherwise noted, Special Agents of the FBI, other law enforcement officers, or other third parties have provided the information set forth in this affidavit to me either directly or indirectly. As such, information in this affidavit may not reflect my personal observations or investigations, but it is information I am aware of and adopt herein for the purposes of this affidavit. Because this affidavit is being submitted for the limited purpose of securing authority to search the identified residential dwelling, I have not included every fact known to me or about the investigation.

2. Based on the facts set forth in this Affidavit, there is probable cause to believe that evidence of violations of Title 18, United States Code, Section 1951, are being maintained and kept at 8802 Corrington Avenue, Kansas City, Jackson County, Missouri.

3. This affidavit is submitted to establish probable cause for the issuance of a search warrant for a residential dwelling located at 8802 Corrington Avenue, Kansas City, Jackson County, Missouri. The dwelling has gray siding, partial brick front, an attached two car garage and the front door faces to the west. The numbers "8802" are clearly marked above the garage. It is the sixth structure south of 87th Terrace on the west side of Corrington Avenue.

PROBABLE CAUSE

4. At about 4:30 a.m. on September 28, 2021, the general manager of the Menards store in West St. Paul, Minnesota was robbed at gunpoint and left zip-tied in his office. Investigators reviewed Menards' surveillance camera recordings of the robbery. The robbery suspect was alone and appeared to brandish a black revolver. The Menards' surveillance camera recording showed what the robbery suspect was wearing and that he was a black male with a white beard. However, the robbery suspect was wearing a medical mask, so his face was obscured. The robbery suspect left the Menards store on foot at approximately 4:45 a.m., on September 28, 2021.

5. During subsequent investigation, FBI SA Christopher Langert learned from Menards' and surrounding businesses' exterior surveillance recordings that the robbery suspect was dropped off on the evening of September 27, 2021, near the Menards store by a blue Hyundai Tucson owned by Muhammad Abdullah ALIM. Upon further investigation, SA Christopher Langert learned that ALIM lives in an apartment on Oakdale Avenue, in West St. Paul, Minnesota, located about a mile from the Menards store.

6. Surveillance camera recordings from ALIM's apartment parking garage were reviewed which showed him leaving the parking ramp in his blue Hyundai Tucson on the evening of September 27, 2021, and returning in the early morning of September 28, 2021, with a passenger that matched the robbery suspect's appearance.

7. SA Christopher Langert reviewed the NCIC records of Muhammad Abdullah ALIM which showed ALIM has several aliases including, Kevin Dunmore, Roderick Dunmore, Abdullah Muhammed ALIM and Darrell Simpson. The NCIC record shows

ALIM has multiple arrests and convictions. ALIM was convicted of two counts of Bank Robbery, a felony offense with a punishment of more than one year in prison in the District of Minnesota in April 2002, using the name Roderick Dunmore. The Defendant received a sentence of 84 months and was present in Court when he was sentenced. During those robberies, ALIM told the tellers he had a gun, and had his hand in his pocket appearing to be armed. ALIM was also convicted of Felon in Possession of a Firearm in 2009.

8. Investigation revealed ALIM's cell phone telephone number to be (651) 246-2743, a T-Mobile cell phone account. On October 21, 2021, a West St. Paul Police Investigator obtained and executed state search warrant for records related to ALIM's cell phone number of (651) 246-2743. A review of these records showed ALIM received telephone calls on September 28, 2021, at 2:47 a.m., and again at 5:12 a.m., from phone number (816) 490-8068. These calls were of investigative interest because the first call occurred while the robbery suspect was hiding inside the Menards store and the second call occurred approximately 25 minutes after the robbery.

9. On October 27, 2021, SA Christopher Langert and a West St. Paul Police Investigator interviewed ALIM. ALIM stated he is the registered owner and user of a 2020 blue Hyundai Tucson and that he was the only driver of this car for the past year. ALIM was questioned about the robbery but denied involvement. ALIM stated he has lived alone in his apartment for over a year. ALIM stated his phone number was (651) 246-2743.

10. SA Jonathan Spaeth conducted an open-source search of the telephone number (816) 490-8068 and discovered the listed subscriber to be "Cornelio Graham" with an address of 8802 Corrington, Kansas City, Missouri.

11. Further research revealed that Cornelius Graham (GRAHAM) is currently on supervised release in Kansas on federal charges. GRAHAM was released from prison in August of 2020 after serving 308 months for federal bank robbery charges. During the investigation of the robbery, it was learned that ALIM was contacting phone number (816) 490-8068 during and soon after the robbery. According to GRAHAM's U.S. Probation Officer, GRAHAM has been using that number since his release from federal prison last year, including during a home visit by U.S. Probation officers as recently as October 28, 2021.

12. On November 3, 2021, your affiant reviewed photographs of GRAHAM provided by the Missouri Department of Vehicle Services. Your affiant compared GRAHAM's photograph to surveillance camera recordings from the parking garage of ALIM's apartment complex. Your affiant also compared GRAHAM's photograph to surveillance camera still photographs from the Menards store showing the robbery suspect entering the Menards store and of the robbery suspect taking money from the Menards' general manager. GRAHAM's photograph appears to match that of the still photographs of the robbery suspect.

13. On October 29, 2021, SA Christopher Langert sent still images and video of the robbery suspect to GRAHAM's U.S. Probation officer. The U.S. Probation officer believes the suspect in the still images and the video is GRAHAM.

14. On October 29, 2021 SA Christopher Langert learned from GRAHAM's U.S. Probation Officer that GRAHAM's address is 8802 Corrington Avenue, Kansas City, Missouri 64138 and that GRAHAM lives with his brother who was a co-defendant in the offense for which GRAHAM is on supervised release. GRAHAM's U.S. Probation Officer conducted a home visit at the address on October 28, 2021 and GRAHAM was present and living there.

15. Records from the U.S. Bureau of Prisons show inmate GRAHAM and inmate ALIM were both housed at the United States Penitentiary (USP) Leavenworth, Kansas from 02-28-2003 thru 01-28-2005. During this time GRAHAM and ALIM shared the same housing unit for over 13 months.

16. I know Menards to be a nationwide retail store headquartered in Eau Claire, Wisconsin, and having stores throughout the upper Midwest including Minnesota, North Dakota, South Dakota, Iowa, Wisconsin, and Michigan. I know Menards to sell tools, home improvement items and construction materials obtained from throughout the United States and several foreign countries.


17. On November 3, 2021, a federal arrest warrant was issued in the District of Minnesota for GRAHAM for violation of Title 18, United States Code, Sections 1951(b)(3) and 1951(b)(1).

CONCLUSION

Based on the information set forth above, I believe that there is probable cause to believe that GRAHAM, violated Title 18, United States Code, Section 1951 on or about September 28, 2021, by committing the armed robbery of a Menards store in and affecting interstate commerce. Further, I respectfully submit there is probable cause to believe that evidence of the violation of Title 18, United States Code, Section 1951, Conspiracy to Commit Hobbs Act Robbery is currently located at the residence. I respectfully seek from the Court a warrant authorizing the search of the residence located at 8802 Corrington Avenue, Kansas City,


Missouri 64138, Jackson County, Missouri, in order to search for those items listed in
Attachment A.

FURTHER AFFIANT SAYETH NAUGHT.


Jonathan Spaeth
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me by telephone on November 4, 2021.

At 5:29 pm


HONORABLE W. BRIAN GADDY
United States Magistrate Judge
Western District of Missouri

